

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

1. MATTHEW COLWELL,  
Plaintiff,

V.

1. RYAN WALTERS,  
in his individual capacity, and

2. MATT LANGSTON,  
in his individual capacity,  
Defendants.

No. CIV-23-476-G

## PLAINTIFF'S OBJECTIONS TO THE DEFENDANTS' EXHIBITS

**COMES NOW THE PLAINTIFF**, and hereby offers her objections to the Defendant's exhibits:

<u>No.</u>	<u>Date/Description</u>	<u>Objection</u>
<u><b>WILL USE</b></u>		
1.	Termination letter dated May 25, 2023	No objection.
2.	Contemporaneous statement of Susan Miller describing the incident with Plaintiff which led to his termination dated May 31, 2023	No objection.
3.	Plaintiff's W-2s from OSDE for 2022 and 2023, showing compensation Plaintiff was receiving at OSDE	Defendant has not produced the listed document, and a motion to compel is pending. Defendant is barred from using this or any other documents pursuant to Civ.P. 37(c)(1).

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| 4. | Plaintiff's benefit records for OSDE for 2022 and 2023 showing the value of any benefits received by Plaintiff from OSDE  | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1)  |
| 5. | Plaintiff's pay and income records for any job held after his termination from the OSDE   | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1)  |
| 6. | Any document substantiating Plaintiff's 2022 and 2023 showing the value of any allegation that he provided OSDE information to the Oklahoma AG's office or an Oklahoma State Representative, and the respective dates of any such occurrence  | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1); not identified or produced; objections under FRE 401-403, 801-802, and 901 for relevancy, hearsay and authentication. |
| 7. | Plaintiff's interview with KFOR on or about June 7, 2023. <a href="https://kfor.com/news/local/dumpster-fire-frmr-osde-employee-wrongfullyterminated-for-voicing-concerns-over-teacher-bonuses/">https://kfor.com/news/local/dumpster-fire-frmr-osde-employee-wrongfullyterminated-for-voicing-concerns-over-teacher-bonuses/</a> | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1); FRE 401-403, 801-802, 901; relevancy, hearsay, authentication.  |

**MAY USE**

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| 8.  | OSDE Employee Handbook, or excerpts thereof                       | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1) |
| 9.  | Employee Handbook acknowledgment signed by Plaintiff on 1/18/22   | No objection.                                     |
| 10. | Plaintiff's offer letter with OSDE dated 12/30/21                 | No objection.                                     |
| 11. | Loyalty Oath signed by Plaintiff dated 1/18/22                    | No objection.                                     |
| 12. | Any job description related to Plaintiff's position with the OSDE | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1) |

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| 13. | Confidentiality agreement signed by Plaintiff on 1/18/22   | No objection.   |
| 14. | Any document which Plaintiff alleges to have shared with the Oklahoma AG's office and/or Representative Fugate             | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1); not identified or produced; relevancy, hearsay, authentication. FRE 401-402, 801-802, 901. |
| 15. | OSDE organizational charts   | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1)   |
| 16. | Email from Matt Langston to OSDE employees dated May 25, 2023, re "SDE Policy on Interaction with the Press – Termination" | No objection.   |
| 17. | Any medical records produced by Plaintiff in the case evidencing his claimed emotional distress (or lack thereof)          | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1)   |
| 18. | Exhibits to any deposition taken in this matter, not objected to by Defendants   | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1)   |
| 19. | Exhibits affixed to any motion, not objected to by Defendants  | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1)   |
| 20. | Documents used for impeachment to which Defendants do not object   | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1)   |
| 21. | Portions of transcripts to which Defendants do not object  | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1)   |
| 22. | Further documents identified through discovery   | See Objection to No. 3 and Fed.R. Civ.P. 37(c)(1)   |

**RESPECTFULLY SUBMITTED THIS 2<sup>nd</sup> DAY OF MAY, 2025.**

HAMMONS, HURST & ASSOCIATES

s/Mark Hammons

Mark Hammons, OBA No.3784  
325 Dean A. McGee Avenue  
Oklahoma City, Oklahoma 73102  
Telephone: (405) 235-6100  
Facsimile: (405) 235-6111  
assistant@hammonslaw.com  
*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

A true copy of the foregoing was filed and served by use of this Court's ECF system of filing and service to the opposing counsel below listed on May 2<sup>nd</sup>, 2025.

David R. Gleason, OBA No. 31066  
Moricoli, Kellogg, & Gleason, P.C.  
One Leadership Square, Ste. 1350,  
211 N. Robinson Ave.  
Oklahoma City, OK 73102  
Phone: 405-235-3357  
Email: dgleason@moricoli.com  
*Attorney for Defendants in their individual capacities*

s/Mark Hammons